

RCRA LAND DISPOSAL RESTRICTION INSPECTION

EPA Region 5 Records Ctr.



386165

Facility:

Perma Treat of Illinois

U.S. EPA I.D. No. :

ILD 063 698971 IEPA # 1790555010

Street:

Marion Industrial Drive

City:

MarionState: Ill.Zip: 62959

Telephone:

Owner/Operator:

Street:

Same

City:

State: _____

Zip: _____

Telephone:

Inspection Date:

06/20/91 Time: 9:00 - 11:45am

Weather Conditions:

Sunny, 80

Inspectors:

Name

Agency/Title

Telephone

Gerald E. Stoltz IEPA (618) 997-4321Bruce Ford IEPA (217) 282-2676Facility
Representative:C.J. BondRudy Bond

F-Solvent

Dioxin

California List

First Third

Second Third

Third ThirdGenerateTransportTreatStoreDispose

X

X

1

Revised 10-20-89

RECEIVED

11 SEP 1991

NOV 22 1989

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ___ No ☒ List* _____

b. Dioxin-containing Wastes

Yes ___ No ☒ List* _____

c. California List Wastes

Yes ___ No ☒ List* _____

d. First ~~and~~ Second ^{Third} Wastes

Yes ☒ No ___ List* D004, D007

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date -- 11/08/90).

Yes ___ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

Yes ___ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

Yes ___ No ☒ Comments _____

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GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☐ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
D004, D007	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ___ No ___

- TCLP Yes ☒ No ___ NA ___

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

0004, 0007 - 1-23-89

- Total constituent analysis Yes ___ No ___ NA ___

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- pH ≤ 2 Yes ___ No ___ NA ___

List the wastes for which pH testing was used.

- Paint Filter Liquid Test Yes ___ No ___ NA ___

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☒ No ☒ NA ___

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ___ Comments stored for longer than 90 days in a pile

If yes, the TSD Checklist must be completed.

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes X No ___

Applicable treatment standards and prohibition levels Yes L No ___

Manifest number Yes X No ___

Waste analysis data, if available Yes X No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes X No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No MRX If no, go to 4)

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments _____

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TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

- C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ☐ No ☐ NA ☒

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☒ No ☐ NA ☐

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☒ No ☐ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☐ Tanks

☐ Containers

☒ Other (Identify inappropriate storage unit(s). Waste pile)

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☐ No ☐ NA ☒

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes X No

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

0004-0007 - Waste pile

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes _____ No _____ NA

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☒ No ☐

If yes, at what frequency? Bi Annual

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes _____ No _____

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes X No _____ Comments _____

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes No X Change as 725 storage vials